

1 HEATHER E. WILLIAMS, SBN 122664
Federal Defender
2 JEROME PRICE, SBN 282400
CHRISTINA SINHA, SBN 278893
3 Assistant Federal Defender
Designated Counsel for Service
4 801 I Street, Third Floor
Sacramento, CA 95814
5 T: (916) 498-5700
6 Attorneys for Defendant
ROLAND HEATHINGTON
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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,) Case No. 2:20-CR-008-TLN-1
11)
Plaintiff,) **STIPULATION AND ORDER TO CONTINUE**
12) **STATUS CONFERENCE AND EXCLUDE TIME**
vs.)
13) Date: September 24, 2020
ROLAND HEATHINGTON,) Time: 9:30 A.M.
14) Judge: Hon. Troy L. Nunley
Defendant.)
15 _____)

16 IT IS HEREBY STIPULATED and agreed by and between United States Attorney
17 McGregor W. Scott, through Assistant United States Attorney Ross Pearson, counsel for
18 Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender Christina
19 Sinha, counsel for Defendant Roland Heathington, that the status conference currently set for
20 September 24, 2020 may be continued to **November 12, 2020 at 9:30 A.M.** The parties
21 specifically stipulate as follows:

- 22 1. By previous order, this matter was set for a status on September 24, 2020.
- 23 2. By stipulation, Mr. Heathington moves to continue the status conference to
24 November 12, 2020.
- 25 3. The government has represented that the discovery associated with this case
26 includes police reports, body camera recordings, photographs, and various
27 documents that have either been produced to the defense or made available for
28

inspection and copying.

4. Defense counsel represents that they require additional time to review this discovery, investigate possible defenses and pretrial motions, consult with Mr. Heathington, and explore potential resolutions to the case.

5. Defense counsel believes that failure to grant the requested continuance would deny them the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

6. The government does not object to the continuance.

7. Therefore, the parties stipulate that the ends of justice served by granting the continuance outweighs the best interest of the public and Mr. Heathington in a speedy trial, and request the Court so to find.

8. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial Act), the parties request that the time period between September 24, 2020 and November 12, 2020 (inclusive) be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance granted by the Court at Mr. Heathington's request, based on a finding that the ends of justice served by granting the continuance outweighs the best interest of the public and Mr. Heathington in a speedy trial.

Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Date: September 21, 2020

/s/ Christina Sinha
CHRISTINA SINHA
Assistant Federal Defender
Attorneys for Defendant
ROLAND HEATHINGTON

Date: September 21, 2020

MCGREGOR W. SCOTT
United States Attorney

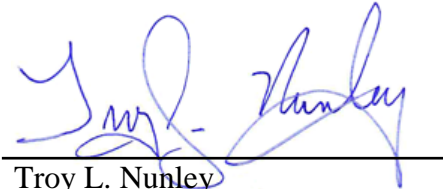
/s/ Ross Pearson
ROSS PEARSON
Assistant United States Attorney
Attorneys for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: September 21, 2020


Troy L. Nunley
United States District Judge